

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AKHMED GADZHIEVICH BILALOV,

Plaintiff,

20-Civ-09153 (AT) (JW)

-against-

HERMAN GREF, SBERBANK CIB USA, INC.,  
SBERBANK OF RUSSIA PJSC, and DOES 1-  
100 inclusive,

Defendants.

**PLAINTIFF AKHMED GADZHIEVICH BILALOV'S  
EX PARTE EMERGENCY MOTION  
FOR AN ASSET FREEZE AND OTHER RELIEF**

SHPIGEL LAW. P.C  
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March 8<sup>th</sup>, 2022

Plaintiff AKHMED GADZHIEVICH BILALOV (hereinafter "Mr. Bilalov" or "Plaintiff") hereby moves the Court, on an *ex parte* emergency basis, for an order freezing assets and for other emergency relief, including an order to show cause, against defendants HERMAN GREF, SBERBANK CIB USA, INC., SBERBANK OF RUSSIA PJSC (collectively, "Sberbank Defendants"), to prevent the further dissipation or expatriation of assets.

This motion is made pursuant to Rule 65 of the Federal Rules of Civil Procedure and Local Civil Rule 6.1, and is supported by the Second Amended Complaint, a Proposed Order, the Declaration of Irina Shpigel pursuant to Local Rule 6.1(d), and in support of the motion and the Memorandum of Law.

Plaintiff seeks an order (1) freezing the assets that are owned by, or under the control of, Sberbank Defendants and Herman Gref, (2) permitting immediate discovery of documents from Sberbank Defendants, and (4) preventing Sberbank Defendants from destroying or altering documents.

As described in the Memorandum of Law and the Declaration of Irina Shpigel pursuant to Local Rule 6.1(d), Plaintiff makes this motion on an emergency *ex parte* basis.

For the reasons stated in the Plaintiff Memorandum of Law and above, the Plaintiff, therefore, asks that its emergency motion be granted and that an Order in the form of that attached to this filing be entered by the Court.

Dated: March 8<sup>th</sup>, 2022

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